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UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF WASHINGTON
 AT SEATTLE

No.: 2:16-cv-00571

PERIENNE DE JARAY,

Plaintiff,

v.

ATTORNEY GENERAL OF CANADA FOR
 HER MAJESTY THE QUEEN, CANADIAN
 BORDER SERVICES AGENCY, GLOBAL
 AFFAIRS CANADA fka DEPARTMENT OF
 FOREIGN AFFAIRS AND
 INTERNATIONAL TRADE CANADA,
 GEORGE WEBB, KEVIN VARGA, and
 PATRICK LISKA,

Defendants.

DECLARATION OF MURRAY ERICKSON
 IN SUPPORT OF PLAINTIFF'S
 OPPOSITION TO DEFENDANTS'
 MOTION TO DISMISS

I, Murray Erickson, hereby declare as follows:

1. I am over the age of 18, and I have personal knowledge of the following facts. I currently live in Portland, Oregon.
2. I worked as a robotics production manager at APEX-Micro America, Inc. ("Apex America"), in Ferndale, Washington. I lost my job when Apex America was forced to shut down after the Canadian Border Services Agency ("CBSA") accused Perienne de Jaray and Apex America of illegal arms dealing.
3. A CBSA investigator attempted to contact me while I was living and working in

1 the state of Washington, and left messages requesting that I meet with him in Washington. At
2 the time, there were rumors circulating around Apex America, because of many Apex America
3 employees being contacted by Canadian investigators. I was scared that I would be considered
4 “guilty by association,” and began avoiding telephone calls and contact with persons not
5 personally known to me.


6 4. Other Apex America employees reported to me that Canadian investigators were
7 asking questions about Ms. de Jaray and the operation of Apex America. They also reported to
8 me that Canadian investigators were asking whether anyone was aware of any suspicious
9 activity, and suggesting that Ms. de Jaray and Apex America were involved in something
10 sinister.

11 5. I had a close relationship with Ms. de Jaray when she started to disengage from
12 co-workers and friends. She had been very outgoing and confident, and I thought of her as stable
13 and successful. But when Apex America employees and friends started demanding answers
14 about CBSA investigators contacting them all here in the United States and asking questions
15 about illegal activity, Ms. de Jaray began to struggle mentally, emotionally, and physically. I
16 watched Ms. de Jaray and Apex America fall apart as employees grew paranoid and customers
17 pulled their business as a result of the CBSA investigation.

18 6. I would be willing to testify in this case.

19 I declare under penalty of perjury under the laws of the United States that the foregoing is
20 true and correct to the best of my knowledge, information, and belief.

21 DATED this 17th day of October, 2016.

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24 
25 Murray Erickson
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